

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 05-30117-KPN

KATHLEEN MILLER,
Plaintiff

v.

VERIZON COMMUNICATIONS INC.,
Defendant

PLAINTIFF'S ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO SERVE
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT AND TO FILE MOTION WITH THE COURT

NOW COME the Plaintiff, Kathleen Miller, in the instant case, and respectfully requests that this Court allow her Assented-To Motion For Enlargement Of Time To Serve Plaintiff's Opposition To Defendant's Motion For Summary Judgment, from June 30, 2006 to July 10, 2006.

The Defendant's Motion for Summary Judgment raises issues to which the Plaintiff must respond. Given the numerous issues involved, the Plaintiff appropriately requests a ten-day enlargement of time within which to respond to the Defendant's Motion for Summary Judgment. Additionally, Counsel for the Plaintiff has various scheduling conflicts that will make it very difficult for the Plaintiff to file her Opposition To Defendant's Motion for Summary Judgment on June 30, 2006. Furthermore, Counsel for the Defendant has expressed his assent to this Motion.

WHEREFORE, the Plaintiff respectfully request that this Court grant the within Motion to extend the time to file her summary judgment opposition to July 10, 2006.

Respectfully submitted:

The Plaintiff
KATHLEEN MILLER

Assented-To:

The Defendant
VERIZON COMMUNICATIONS, INC.

By: /s/ Michael O. Shea
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Dated: June 22, 2006